

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF PENNSYLVANIA

BESSEMER SYSTEM FEDERAL CREDIT)
UNION,)

Plaintiff,)

vs.)

FISERV SOLUTIONS, LLC, FISERV)
SOLUTIONS, INC., and FISERV, INC.,)

Defendants.)

Case No. 2:19-cv-00624-RJC

**DECLARATION OF JESSE BYAM-KATZMAN IN SUPPORT OF DEFENDANTS’
MOTION FOR ENTRY OF PROTECTIVE ORDER**

I, Jesse L. Byam-Katzman, hereby state as follows under penalty of perjury
pursuant to 28 U.S.C. § 1746:

1. I am over 18 years of age, an adult resident of Wisconsin, and am competent to
testify as to all matters set forth in this Declaration.

2. I am counsel for Fiserv Solutions, LLC, f/k/a Fiserv Solutions, Inc., and Fiserv,
Inc. (“Defendants”) in the above-captioned matter and am admitted *pro hac vice* to practice in
this Court. I submit this Declaration in support of Defendants’ Motion for Entry of Protective
Order.

3. Attached hereto as **Exhibit 1** is a true and correct copy of excerpted selections of
Plaintiff’s First Amendments to Responses and Objections to Defendants’ First Set of Discovery
Requests dated June 25, 2021.

4. Attached hereto as **Exhibit 2** are true and correct copies of the protective orders
entered in the following actions:

- *In re Experian Data Breach Litig.*, No. 15-cv-01592, Dkt. 187 (S.D. Cal. Aug. 9, 2016);

- *In re Target Corp. Customer Data Sec. Breach Litig.*, No. 14-md-02522, Dkt. 92 (D. Minn. June 25, 2014);
- *Genesco, Inc. v. Visa U.S.A., Inc.*, No. 13-0202, Dkt. 48 (M.D. Tenn. July 3, 2013).

5. Attached hereto as **Exhibit 3** are true and correct copies of the protective orders entered in the following actions:

- *Greater Chautauqua Federal Credit Union v. KMart Corporation et al.*, No. 15-cv-02228, Dkt. 111 (N.D. Ill. Oct. 14, 2016);
- *Pennsylvania State Emps. Credit Union v. Fifth Third Bank*, No. 04-cv-01554, Dkt. 46 (M.D. Pa. Jan. 7, 2005).

I declare under the penalty of perjury under the laws of the United States that the foregoing is true and correct.

Dated: January 28, 2022

/s/ Jesse L. Byam-Katzman
Jesse L. Byam-Katzman